

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NUMBER: _____
v.	:	DATE FILED: _____
SHERELLE PRATT	:	VIOLATIONS:
	:	26 U.S.C § 7206(1)(filing material false
	:	federal income tax returns – 3 counts)
	:	26 U.S.C. § 7206(2)(aiding and assisting
	:	in the preparation and filing of false
	:	returns – 4 counts)
	:	18 U.S.C. § 641 (theft of government
	:	property – 1 count);
	:	18 U.S.C. § 1028A (aggravated identity
	:	theft – 1 count)
	:	Notice of forfeiture

INDICTMENT

COUNTS ONE THROUGH FOUR

THE GRAND JURY CHARGES THAT:

At all times relevant to this indictment:

GENERAL ALLEGATIONS

1. The Internal Revenue Service (“IRS”) was an agency of the United States Department of Treasury charged with the responsibility of administering the tax laws of the United States.

2. The Treasury Inspector General Office for Tax Administration (“TIGTA”) was an agency with the United States Department of Treasury charged with, among other things, investigating misconduct by IRS employees.

3. The Integrated Data Retrieval System (“IDRS”) was an electronic data base which stored, on computer servers, tax returns and return information for individuals required to file tax returns as well as tax return transcripts which showed a tax filer’s marital status, type of return filed, adjusted gross income taxable income, refunds issued and tax deficiencies owed by filers.

4. L.H., B.H, E.B., C.W., M.B., S.S., W.M., S.T., M.P., and S.M. are individuals known to the Grand Jury.

THE DEFENDANT

5. Defendant SHERELLE PRATT was an IRS employee. She was hired by the IRS as a contact representative on January 7, 2008.

6. On about April 6, 2009, “L.H.” contacted the IRS regarding his son’s 2007 tax return which had been prepared by defendant SHERELLE PRATT. According to L.H., his son, “B.H.” was slated to receive a tax refund of \$958 from the IRS for tax year 2007 and a \$600 stimulus check.

7. In response to the complaint raised by L.H., TIGTA started an investigation of defendant SHERELLE PRATT to determine if she had prepared a 2007 tax return for B.H. TIGTA’s investigation revealed that defendant PRATT had deposited B.H.’s 2007 tax refund and his stimulus check into her personal bank account at TD Bank, account number xxxxx9776, (hereinafter “TD Bank checking account”).

8. TIGTA also learned, from a review of IDRS data, that defendant SHERELLE PRATT had deposited into her TD Bank checking account tax refund checks for other individuals for whom she had prepared tax returns for tax years 2006 through 2008. In addition

to the B.H. return, TIGTA learned that defendant PRATT had also deposited into her checking account the refund checks and, in some cases, the stimulus checks of E.B.; C.W.; M.B.; S.S; W.M., S.T., M.P; and S.M.

9. For tax years 2007 through 2009, defendant SHERELLE PRATT failed to report approximately \$28,767.95 as income which she stole from individuals for whom she prepared tax returns.

10. On or about the dates listed in the chart, each tax year constituting a separate count, in the Eastern District of Pennsylvania and elsewhere, defendant

SHERELLE PRATT

knowingly and willfully subscribed IRS Forms 1040, a United States Individual Income Tax Returns for each of the years listed in the chart below which was verified by a written declaration that they were made under the penalties of perjury which she did not believe to be true and correct as to every material matter:

Count	Tax Year	Date File with IRS Service Center	False Matter Re Return
1	2007	February 18, 2008	Line 21 (adjusted gross income
2	2008	February 2, 2009	Line 37 (adjusted gross income)
3	2009	August 17, 2011	Line 37 (adjusted gross income

All in violation of Title 26, United States Code, Section 7206(1).

COUNTS FOUR THROUGH SEVEN**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs One through Nine of Count One are incorporated here.
2. On or about the dates listed in the chart below, in the Eastern District of Pennsylvania and elsewhere, defendant

SHERELLE PRATT

willfully aided, assisted, procured, counseled, and advised the preparation and presentation to the Internal Revenue Service, of United States Individual Income Tax Returns, Forms 1040 and accompanying Schedules, for taxpayers known to the Grand Jury, and who are identified below by initials, when defendant PRATT then and there well knew and believed that the returns and accompanying schedules were materially false as described in the counts listed below:

Count	Date Return Filed	Filer's Initials	Tax Filing Year	Materially False Information
4	February 12, 2008	S.S.	2007	Defendant included false child and dependent care expenses on S.S. 2007 tax return.
5	February 18, 2009	S.S.	2008	Defendant included false child and dependent care expenses on S.S. 2008 tax return.

Count	Date Return Filed	Filer's Initials	Tax Filing Year	Materially False Information
6	February 13, 2009	M.B.	2008	Defendant included income from a Schedule C business which the filer did not own.
7	February 4, 2009	M.P.	2008	Defendant included deductions for two dependents with whom the filer was not acquainted and did not support for tax year 2008.

All in violation of Title 26, United States Code, Section 7206(2).

COUNT EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs One through Three of Count One are incorporated here.
2. On or about February 18, 2009, in Philadelphia, in the Eastern District of Pennsylvania, defendant

SHERELLE PRATT

stole, purloined and knowingly converted to her own use a thing of value of the United States in an amount over \$1,000, that is, a tax refund check in the amount of \$3,524 which check had come into the possession of defendant PRATT as a result of defendant PRATT having fraudulently filed a 2008 tax return with the IRS using personal identifying information of E.B., without E.B.'s knowledge and authorization, which resulted in a refund check being issued to "E.B." that was electronically deposited into the defendant's T.D. Bank checking account.

In violation of Title 18, United States Code, Section 641.

COUNT NINE

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs One through Three are incorporated here.
2. On or about February 18, 2009, at Philadelphia, in the Eastern District of Pennsylvania, defendant

SHERELLE PRATT

knowingly possessed and used, without lawful authority, a means of identification of another person, that is, the name and social security number of E.B. during and in relation to the theft of public money and property, that is a tax refund that had been issued by the IRS to E.B.

In violation of Title 18, United States Code, Section 1028A(a)(1) and (c)(1).

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Section 641, as set forth in Count 8

SHERELLE PRATT

shall forfeit to the United States of America all property, real or personal, involved in the commission of the offenses and all property traceable to such property, including, but not limited to the sum of \$ 3,524.

1. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred to or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty,

it is the intent of the United States, pursuant to Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p) to seek forfeiture of any other property of the defendant up to the value of the property subject to forfeiture.

All pursuant to Title 18, United States code, Section 981(a)(1)(C).

A TRUE BILL:

GRAND JURY FOREPERSON

**ZANE DAVID MEMEGER
UNITED STATES ATTORNEY**